

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : **ECF Case**

vs. : No. 07 Cr. 1170 (LBS)

JOSEPH P. COLLINS, : **NOTICE OF MOTION**

Defendant. :

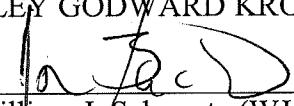
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PLEASE TAKE NOTICE that, on the Declaration of Jonathan Bach, the Affidavit of Barry D. Colvert, and the accompanying memorandum of law, Defendant Joseph P. Collins will move this Court, before the Honorable Leonard B. Sand, United States District Judge for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined, for an order:

- (1) requiring the government to produce further particulars with regard to its forfeiture allegations and the specific false statements or omissions that Collins allegedly made or aided and abetted others in making;
- (2) admitting into evidence the results of a polygraph examination or scheduling an evidentiary hearing to consider the same;
- (3) requiring the government to produce *Brady* material immediately and *Giglio* and 3500 material at least two months before trial; and
- (4) granting any further relief the Court deems just and proper.

Dated: New York, New York
June 27, 2008

COOLEY GODWARD KRONISH LLP

By: 
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Attorneys for Defendant Joseph P. Collins

CERTIFICATE OF SERVICE

I, Timothy M. Kerr, hereby certify that on this 27th day of June, 2008, I served a true and correct copy of Defendant Joseph P. Collins's Pre-Trial Motions, including Notice of Motion, Declaration of Jonathan Bach, Affidavit of Barry D. Colvert, Exhibits A-D and Memorandum of Law by Electronic Court Filing, upon:

Christopher Louis Garcia
U.S. Attorney Office for the Southern District of New York
One St. Andrew's Plaza
New York, NY 10007

/s/ Timothy M. Kerr
Timothy M. Kerr (TK 3979)